



State of Ohio Environmental Protection Agency

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August 10, 2009

US EPA RECORDS CENTER REGION 5



Mr. James Augustyn, OSC  
c/o U.S. EPA – Cleveland Office  
25089 Center Ridge Road  
Westlake, Ohio 44145

**RE: Ohio EPA Review and Comments on Draft Quality Assurance Project Plan under Settlement Agreement No. V-W-09-C-929, for the General Industries Site, Elyria, Ohio (Site ID# B5QG)**

Dear Mr. Augustyn:

The Ohio Environmental Protection Agency (Ohio EPA) has completed its review of the proposed "Sampling and Quality Assurance Plan for the General Industries Site" ("QAPP"), received by this office via e-mail on August 5, 2009. We appreciate the opportunity to provide comments.

In general, we found this document to be significantly deficient in most aspects. There was a lack of specific information throughout the sections. Because of the lack of specific information (e.g. asbestos sample collection methodology, non-porous material decontamination and sampling, drum characterization sampling), the reviewers were unable to evaluate the adequacy of these sampling and analysis activities.

General Comments

- There is no mention at all in this document of the role of the ODH-certified project designer. Based on Ohio EPA's understanding of recent discussions among the regulatory agencies (ODH, Ohio EPA and U.S. EPA), the remedial activities at this site require ODH certification above the level of asbestos hazard evaluation specialist level (the current certification of Robert Walter, identified as project manager) for design and oversight of this project.
- Throughout the document, there is references to "sampling of bricks." Ohio EPA has stated to the owner and his consultant on a number of occasions that in addition to bricks, sampling of suspect asbestos-containing material (ACM) that is discovered either on the surface or at depth in the gridded sections of the site must be conducted. This also includes other debris in the gridded sections.
- Significant amounts of water will be required to conduct asbestos abatement, decontamination and dust suppression activities. This water will have to be disposed of in some manner. There is no mention of sampling methods for this potentially contaminated waste stream at any point in the document.
- The information presented outlining the steps to characterize the waste on site as either hazardous or non-hazardous is lacking in sufficient detail to give any assurances that the waste will be properly characterized as required by Ohio Administrative Code (OAC) rule 3745-52-11.



- There needs to be detail included as to how the analytical data and quality assurance/quality control information will be of a sufficient quality to support at least a Tier 1 Data Validation.
- As previously communicated to B-Vest, the fire debris (C&DD, Solid Waste) at the General Industries site would meet the definition of a "waste" if it is discarded. A discarded material is any material that is abandoned or recycled. Material is abandoned if it is disposed of, burned or incinerated or accumulated, stored or treated before or in lieu of being abandoned by being disposed of, burned or incinerated. Prior to being discarded, the debris (waste) would need to be characterized per OAC rule 3745-52-11. For the fire debris, the waste would need to be evaluated for the constituents found in Table 1 of OAC rule 3745-51-24, Toxicity Characteristics. The waste will be considered a hazardous waste if, using the toxicity characterization leaching procedure (TCLP), test method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," US EPA Publication SW-846, the extract from the representative sample of the waste contains any of the concentrations equal to or greater than the respective values given in the Table. The characterization of the fire debris should be included in the Sampling and Quality Assurance Plan.
- Any waste generated from the washing of the bricks would also need to be characterized and therefore, included in the Sampling and Quality Assurance Plan. Specific detail will need to be included outlining how this would be done.

Specific Comments:

Worksheet #5 Personnel Responsibilities and Qualifications Table

- Contractor – The contractor is unnamed and obviously no credentials are listed for him/her. The delegation by the contractor to the (also unnamed) subcontractor is a concern to Ohio EPA. These positions need to be filled by individuals whose credentials can be evaluated by the appropriate regulatory agency.

Work Sheet #7 Problems Defined

- Asbestos: According to the U.S. EPA policy entitled "Asbestos/NESHAP Demolition Decision Tree" (June 1994), when a facility is demolished (such as through unintentional fire) prior to the removal of regulated asbestos containing material (RACM), all debris is assumed to be RACM unless a site assessment is conducted. That assessment, which is to include both a visual inspection and a data collection of suspect RACM, is not discussed in this section. The method of representative sampling of bricks discussed in this section is not sufficient to meet the NESHAP requirements.
- Asbestos: The statement, "It has been agreed that steel will require washing to be cleaned of any suspect asbestos contamination" is incomplete. Any material which is intended for re-use/recycling must be decontaminated by a process involving a surfactant and rinsing, to be followed by verification wipe sampling.
- Chemical Verification: This section states that chemicals will be segregated by chemical class and compound. There is no detail on the methodology to be used to accomplish this; is this a series of field testing? If so, additional detail should be included. Any information used to do this segregation should be documented and presented with the final waste characterization information
- Chemical Verification: This section states that the waste will be tested based on known or expected information. It is unclear as to what this "known" information is. Additional information needs to be included outlining what steps will be taken should the testing not confirm the presumed characterization.

- Chemical Verification: It is unclear what is meant by the statement "the hazard classification will be determined contrasted with D001 through D043." This should be clarified.

Work Sheet #8 Project Quality Objectives

- Asbestos: A contingency should be included here that states that air samples will be collected on any occasion that there is a visible release of particulates at any time workers are on-site.
- Chemical Sampling: This section is completely inadequate and needs to be revised to include specific information as to the steps to be taken to demonstrate the samples will be collected in a manner that is representative of the fire debris and representative of the waste in the containers. In addition, detail needs to be included demonstrating what measures will be taken to assure the data meets the data objectives.

Work Sheet #9 Measurements Performance Criteria Table

- This section is completely inadequate for the waste characterization and needs to be revised.

Work Sheet #10 Reference Limits

- The hazardous waste regulatory limits should be included in this section.
- The Action Limit for asbestos needs to be corrected. Any asbestos above the detection limit in the debris will require removal and/or handling as RACM. Any asbestos in on-site soils above the site-specific background concentration (yet to be determined) will require removal.

Work Sheet #11 Summary Of Projected Tasks

- Asbestos Sampling of Dust: it is unclear in this section whether or not dust/dirt piles will be sampled. Ohio EPA recommends that non-porous material to be sampled should be subject to wipe or tape sampling, as opposed to low-flow air sampling.
- Chemical Sampling This section is completely lacking in detail and needs to be revised.

Work Sheet #12 Sampling Design And Rationale

- Rationale for sampling bricks: This section is incorrect. Per the NESHAP, any asbestos found in a gridded section will result in that section remaining classified as ACWM. Asbestos cannot be selectively removed from a gridded area, and then the area is deemed to be "clean." When asbestos is found, the surrounding area must be transported and disposed of in accordance with the NESHAP.
- The use of federal Brownfields criteria as a clean-up standard at a CERCLA time-critical removal site is not appropriate. As mentioned above, a site-specific background study must be designed and performed prior to an on-site soil clean-up concentration being established.
- Ohio EPA is concerned that the proposed rate of 15% for testing of the bricks is insufficient to provide a high enough degree of confidence that an area determined to be "free" of ACWM is in fact, "free" of asbestos.
- This section needs to be revised to discuss how the fire debris will be sampled to document whether or not it is hazardous waste. In addition, there is no discussion on the chemical sampling which is discussed on previous work sheets. The container sampling should be included in this section.
- As mentioned above, a more detailed decontamination and verification sampling protocol needs to be developed.

MR. JAMES AUGUSTYN, OSC  
AUGUST 10, 2009  
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Work Sheet #13 Sampling Locations And Methods

- Field screening should be used to conduct the chemical verification; detail of these activities should be included in this section.

Work Sheet #14 Field Quality Control Sample Summary

- Detail should be included to document how quality control samples will be collected for the containers and fire debris waste.

Work Sheet #16 Field Equipment Calibration Maintenance Testing And Inspection

- Detail should be included for the field equipment used to screen the containers.

Work Sheet #17 Sample Handling

- There is insufficient detail to document the non-asbestos samples will meet any Quality Assurance/Quality Control criteria.

Work Sheet #18 Chain of Custody Procedures

- Included in the nomenclature should be "W" for water samples.

Work Sheet #19 Analytical Laboratory Requirements

- There is insufficient detail to document the non asbestos samples will meet any Quality Assurance/Quality Control criteria.

Appendix A, Organizational Chart

- There is insufficient information to determine if in fact any of the project personnel meet ODH or U.S. EPA qualifications for the site activities required.

If you have any questions regarding this letter, please contact me at (330) 963 -1230, or via e-mail at: [Bob.princic@epa.state.oh.us](mailto:Bob.princic@epa.state.oh.us).

Sincerely,

A handwritten signature in cursive script, appearing to read "Bob Princic", followed by the word "for" in a smaller, simpler font.

Bob Princic  
Environmental Supervisor  
Division of Air Pollution Control

BP:bo

pc: Keith Riley, Assistant Chief/NEDO  
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